

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BRENDA G. REED

Case No. 20-01902-JAW
Chapter 13 Proceedings

MOTION OF FIRST TOWER LOAN TO MODIFY § 1301 CODEBTOR STAY

Tower Loan, LLC (Tower), files this Motion to Modify § 1301 Codebtor Stay for the following reasons:

1. Tower has filed, or will file, a proof of claim in this case as a secured creditor in the amount of \$40,679.78.

2. Debtor has failed to properly schedule the full payment of such claim of Tower in her Chapter 13 plan.

3. The name and last known address of the non-filing codebtor is:

Michael Reed
14996 MS Highway 17
Coila, MS 38923

4. To the extent the plan of the Debtor fails to pay the claim of Tower in full through her plan, Tower is entitled to have the stay modified or terminated to collect amounts owed to it.

5. In accordance with the provisions of 11 U.S.C. § 1301(d), should no response to this Motion be filed within twenty days, the stay will be terminated.

Wherefore, Tower requests the Court to grant the Motion and for other such relief as the Court may deem proper and just.

Dated this 13th day of October, 2021.

TOWER LOAN, LLC.

By: /s/ John E. Tucker
Its Attorney

CERTIFICATE OF SERVICE

I do hereby certify that I have this day electronically filed with the Clerk of Court using the ECF system which sent notification, or mailed, via U.S. Mail, postage fully prepaid to non-ECF participants, a true and correct copy of the foregoing Objection of Tower Loan to Confirmation of Chapter 13 Plan to the following:

Robert R. McRaney
mcraneymcraney@bellsouth.net

Office of the U.S. Trustee
USTPRegion05.AB.ECF@us.doj.gov

Brenda G. Reed
1828 Heather Dr.
Vicksburg, MS 39183

Harold J. Barkley
jjones@hbarkley13.com
Chapter 13 Trustee

Dated this the 13th day of October, 2021.

By: /s/ John E. Tucker
Its Attorney

Prepared By:

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